

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Francis Ocansey)	
Plaintiff)	Case No:
)	
vs)	
)	Trial by Jury Demanded
Crown Asset Management LLC)	
Defendant		

COMPLAINT FOR VIOLATION OF THE FCRA

PARTIES

1. The Plaintiff in this lawsuit is Francis Ocansey a natural person, who resides in Fords, New Jersey.
2. The Defendant in this lawsuit is Crown Asset Management LLC, an unknown entity with offices at 3100 Breckinridge Blvd., Suite 725, Duluth, Georgia 30096.

PRELIMINARY STATEMENT

1. This is an action for damages brought for damages for violations of the Fair Credit Reporting Act (FCRA) 15 U.S.C. §1681p *et seq.*

JURISDICTION AND VENUE

1. This court has jurisdiction under 15 U.S.C. §1681p and 28 U.S.C. §1331.
2. All conditions precedent to the bringing of this action have been performed.
3. The occurrences which give rise to this action occurred in Middlesex County, New Jersey and Plaintiff resides in Middlesex County, New Jersey.
4. Venue is proper in the Federal District Court of New Jersey.

5. This is an action for damages which do not exceed \$3,000.00.

FACTUAL ALLEGATIONS

6. I, Plaintiff pulled his consumer credit reports from the three major credit reporting agencies and found entries by entities that he was unfamiliar with in the reports.

7. Plaintiff determined that his consumer credit report had been accessed on various occasions by various entities he did not recognize and without his consent.

8. Plaintiff found after examination of his TransUnion consumer credit report that Defendant Crown Asset Management LLC gained access Plaintiff's TransUnion consumer credit report on May 8, 2017.

9. On May 08, 2017, Crown Asset Management LLC gained accessed to Plaintiff's credit report without a permissible purpose, which appears as an inquiry on his TransUnion Credit Report.

Count 1

VIOLATION OF THE FAIR CREDIT REPORTING ACT (FCRA), 15 U.S.C. §1681 WILLFUL NON-COMPLIANCE BY DEFENDANT

10. Paragraphs 1 through 9 are **realleged** as though fully set forth herein.

11. Plaintiff is a consumer within the meaning of the FCRA, 15 U.S.C. § 1681a(c).

12. TransUnion is a credit reporting agency within the meaning of the FCRA, 15 U.S.C. § 1681a(f).

13. Consumer credit report is a consumer report within the meaning of the FCRA, 15 U.S.C. § 1681a(d).

15. The FCRA, 15 U.S.C. § 1681b(f) defines the permissible purposes for which a person may obtain a consumer credit report.

16. Such permissible purposes as defined by 15 U.S.C. § 1681b are generally, if the consumer makes application for credit, makes application for employment, for underwriting of insurance involving the consumer, or is offered a bona fide offer of credit as a result of the inquiry.

17. Crown Asset Management LLC is a furnisher of information within the meaning of the FCRA, 15 U.S.C. § 1681s-2.

18. Crown Asset Management LLC willfully violated the FCRA. Defendants violations include, but not limited to the following:

(a) Crown Asset Management LLC willing violated 15 U.S.C. § 1681b(f) by obtaining Plaintiff's consumer report without permissible purpose as defined by 15 U.S.C. § 1681b.

19. Plaintiff has never had any business dealings or any accounts with, made application for credit from, made application for employment with, applied for insurance from, or received a bona fide offer of credit from the Defendant Crown Asset Management LLC.

WHEREFORE, Plaintiff demands judgment for damages against Crown Asset Management LLC for actual or statutory damages, and punitive damages, attorney's fees and cost, pursuant to 15 U.S.C. § 1681n.

Count II

**VIOLATION OF THE FAIR CREDIT REPORTING ACT (FCRA), 15 U.S.C. §1681
NEGLIGENCE NON-COMPLIANCE BY DEFENDANT**

20. Paragraphs 1 through 19 are realleged as though fully set forth herein.

21. Plaintiff is a consumer within the meaning of the FCRA, 15 U.S.C. § 1681a(c).

22. Crown Asset Management LLC is a furnisher of information within the meaning of the FCRA 15 U.S.C. § 1681s-2.

23. Crown Asset Management LLC negligently violated the FCRA. Defendant's violations include, but are not limited to the following:

(a) Crown Asset Management LLC negligently violated 15 U.S.C. § 1681b(f) by obtaining Plaintiff's consumer report without permissible purpose as defined by 15 U.S.C. § 1681b.

WHEREFORE, Plaintiff demands judgment for damages against Crown Asset Management LLC for actual or statutory damages, and punitive damages, attorney's fees and cost, pursuant to 15 U.S.C. § 1681o.

DEMAND FOR JURY TRIAL

Plaintiff hereby demand trial by jury of all issues so triable as a matter of law.

Dated: June 19, 2017

Respectfully submitted,



Francis Ocansey
41 Fanning Street
Fords, New Jersey 08863

TransUnion^{tu}

Requested On: 05/09/2017

Permissible Purpose: CONSUMER REQUEST

Requested On: 05/08/2017

[REDACTED]
[REDACTED]
[REDACTED] 1
[REDACTED]
[REDACTED] INC
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED] 09

TP
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[REDACTED]
R
[REDACTED] 07

[REDACTED]
[REDACTED]
[REDACTED]

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UK DE
[REDACTED] 899
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R
[REDACTED] 09/04/2017

[REDACTED]
[REDACTED] 18773
Rev
[REDACTED] 017

[REDACTED]
[REDACTED] 44
Re
[REDACTED]

CROWN ASSET MGMT
3100 BRECKINRIDGE BLVD
STE 725

[REDACTED]
10
S
[REDACTED] 01
[REDACTED]

P
[REDACTED] 801
125 SW 8TH ST
WILLIAMS
[REDACTED] 801
[REDACTED]

R
[REDACTED] 04/2017

[REDACTED]
[REDACTED] 1004
[REDACTED]
[REDACTED] 004
[REDACTED] SECTION

[REDACTED]
[REDACTED] 130
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